

REMARKS

Claim 20 has been amended. Claims 1-9, 11-16 and 19-23 remain for further consideration.

No new matter has been added.

The objections and rejections shall be taken up in the order presented in the Official Action.

1. Claims 1-9, 11-16 and 19-23 currently stand rejected for allegedly failing to comply with the enablement requirement.

This rejection is improper for several reasons.

First, the well known legal doctrine of the *Law of the Case* applies to the present application. Specifically, the present application is a continuation of application serial number 09/713,774 now issued as U.S. Patent 6,647,327. For the purposes of this enablement rejection, the claims of the present application are essentially the same as the claims in the parent. Notably, the claims in the parent were allowed and proceeded to issuance as U.S. Patent 6,647,327. So rejecting the claims in the present application for lack of enablement is contradictory with the previous actions and official position of the USPTO during the prosecution of the parent, now U.S. Patent 6,647,327.

Second, the Official Action contends “[i]t is found no support for the limitation ‘receiving from multimedia units requests for the radio connection’.” (Official Action, pg. 2). This statement is incorrect. The specification discloses this claimed feature in several locations. Specifically, the specification of the published application 2005/0090953 states:

“The interface unit 18 coordinates requests of the multimedia units 12-16 situated in the ring line 20 for radio connection to the external unit 22. If the interface unit 18 receives several requests for a radio connection to the external unit simultaneously from several units 12-16 in the ring line 20, the interface unit 18 determines the sequence for processing the requests in accordance with a specifiable

method. For example, the interface unit 18 can determine the sequence for processing the requests according to the sequence of requesting units in the ring line 20. However, it may also select the sequence for processing the requesting units randomly.” (Emphasis added, [0011]).

Thus, the specification clearly teaches the claimed feature. The Official Action contends “[i]t is important to note that just only a specific unit that contains a communication device for transmitting/receiving data can be used to request for a radio connection with an external unit. Otherwise, a single multimedia unit without a communication unit such as VCR, DVD player, a keyboard, or a monitor cannot be used for requesting a radio connection.” (Official Action, pg. 2). However, the undersigned attorney is confused with respect to what this contention has to do with the claimed invention. The Official Action seems to be trying to telling the Applicant what the claimed invention is. In the claimed invention, multimedia units issue requests for the radio connection with the external unit. Since the interface unit establishes the radio connection with the external unit, coordinating at the interface unit is performed to resolve any contention between the various multimedia units for the radio connection between the interface unit and the external unit.

Third, *prima facie* lack of enablement has not been established since the Official Action fails to discuss the level of ordinary skill in the art, and why the specification fails to enable the claimed invention with respect to the person of ordinary skill in the art.

2. Claim 20 currently stands rejected for allegedly failing to point out and distinctly claim the subject matter deemed to be the present invention.

Claim 20 has been amended to depend from claim 15 to provide the proper antecedent basis.

3. Claims 1-9, 11-16 and 19-23 currently stand rejected for allegedly being anticipated by U.S. Patent 5,574,451 to Tanihira (hereinafter “Tanihira”).

Claim 1

Claim 1 recites a method of data exchange in a vehicular multimedia system that includes an interface unit and a plurality of multimedia units each connected to a data bus in the vehicle. The method includes “*coordinating/arbitrating at the interface unit requests for radio connection to the external unit*.” (emphasis added, cl. 1). This step of coordinating/arbitrating is used to account for situations where several multimedia units are requesting access to the external unit via the interface unit. Tanihira merely discloses that the remote controller 64 transmits commands to the monitor 63 and the commander 11. The Official Action contends “...*the commander (11) is the user interface unit....*” (Official Action, pg. 4). However, the commander 11 does not perform the step of “*coordinating/arbitrating ... for radio connection to the external unit*” since the commander 11 is simply a receiver – that is, the commander 11 does not transmit commands or data to the remote controller 64. The communication channel between the remote controller 64 and the commander 11 is a one-way communication link since commands only pass from the remote controller 64 to the commander 11, and not visa versa. So the commander 11 does not “*coordinating/arbitrating ... for radio connection to the external unit*” (emphasis added, cl. 1) since the commander 11 does not transmit to the remote controller 64. A 35 U.S.C. §102(b) rejection requires a single prior art references that discloses each of the features of the claimed invention. Tanihira is incapable of anticipating the claimed invention since the reference fails to disclose “*coordinating/arbitrating at the interface unit requests for radio connection to the external unit*.” (emphasis added, cl. 1).

Claim 6

Claim 6 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The system includes an interface unit that establishes a radio connection with an external unit “...where the interface unit comprises a coordination unit that coordinates requests received over the data bus from the multimedia units for radio connections to the external unit.” (cl. 6). As set forth above, Tanihira neither discloses nor suggests a coordination unit that coordinates requests at the interface unit for radio connection to the external unit. Notably, Tanihira neither discloses nor suggests an interface unit having “a coordination unit that coordinates requests ... from the multimedia units for radio connections to the external unit.” (emphasis added, cl. 6). Hence, Tanihira is incapable of anticipating claim 6 for at least the same set forth above.

Claim 13

With respect to claim 13, Tanihira neither discloses nor suggests an interface unit that “coordinates requests generated by the multimedia units, the requests being for radio connection with the external interface.” (cl. 13). Hence, for at least the reasons set forth above, Tanihira is incapable of anticipating claim 13.

Claim 21

Claim 21 recites a multimedia system suitable for use in a vehicle and capable of communicating with an external unit. The multimedia system comprises:

“a plurality of multimedia units;
 means for establishing a radio connection with the external unit;
 a data bus in the vehicle, where the means for establishing the radio connection and the plurality of multimedia units are connected to the data bus; and
where the means for establishing coordinates requests received over the data

bus from the multimedia units for radio connections to the external unit.” (emphasis added, cl. 21).

Again, Tanihira simply discloses that a remote controller 64 sends commands via a wireless link to the commander 11 and a monitor 63. The Official Action contends “...*the commander (11) is the user interface unit....*” (Official Action, pg. 4), but the commander 11 of Tanihira is merely a receiver. A fair and proper reading of Tanihira reveals that this reference neither discloses nor suggests coordinating requests received over the data bus from the multimedia units for radio connections to the external unit. Hence, it is respectfully submitted that Tanihira is incapable of anticipating claim 21.

For all the foregoing reasons, reconsideration and allowance of claims 1-9, 11-16 and 18-23 respectfully requested.

If a telephone interview could assist in the prosecution of this application, please call the undersigned attorney.

Respectfully submitted,



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